

EARTHRISE

Date: August 26, 1999

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Dr. Elizabeth Yetley, Ph.D.  
Center for Food Safety and Applied Nutrition,  
Food and Drug Administration  
200 c St. SW.,  
Washington DC, 20204



Dear Dr. Yetley,

We sent you a letter on August 28, 1998 notifying you of our structure/function claims on our **Earthrise® NutraGreens®** dietary supplement labels. We are hereby notifying you that we recently revised these labels. There are no major changes.

**Product Name: NutraGreens® Tablets Size: 70 & 300**  
**NutraGreens® Powder Size: 35g & 200g**

**Ingredient: Vitamins & minerals:** Betatene (natural Beta Carotene), Vitamin D, natural Vitamin E Acetate, Thiamin (Vitamin B-1), Riboflavin (Vitamin B-2), Niacin, **Vitamine B-6 (Pyridoxine HCl)**, **Folic Acid**, Vitamin B-12, d-Biotin, Calcium Pantothenate, Calcium Citrate, Iron Gluconate, Magnesium Citrate, Zinc Methionine, Selenium Aminoate, Copper Gluconate, Manganese Gluconate, Chromium Aminoate, Potassium Aspartate.

**Proprietary Blend 4242 mg:** Spirulina, Lecithin natural Apple Concentrate, natural Citrus Extract (**fruit**), Barley Malt, Barley Grass, Wheat Grass, Chlorella, Prune Powder, Boron Aminoate, Licorice Extract (**DGL**), **Sarsaparilla** Root Powder, **Suma** Root Powder, Flower Pollen Extract, Siberian Ginseng Extract (35: 1, root), Ginkgo Biloba Extract (24% Flavone **Glycosides/6%** Terpene Lactones), Milk Thistle Extract (80% Silymarin), Royal Jelly, Kelp, **Dulse**, New Zealand **Nori** (sea vegetable), Astragalus Root Powder, Stevia Leaf Powder, Ginger Root 5% Extract, Green Tea Extract (50% Polyphenols), Broccoli Powder, Carrot Powder, Beet Powder, Celery Powder, Grape Seed Extract (95% OPC), **Octacosanol**, Pine Bark Extract (50% OPC), Cayenne Pepper (fruit), Coenzyme Q-10.

**Proprietary Digestive complex 253 mg:** Gum Arabic (Acacia), **Lactobacillus Acidophilus**, **Bifidum longum**, Aloe Vera Powder, Amylase, **Cellulase**.

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**Structure Function Claims stated on all NutraGreens® labels:**

- Reduces effects of stress\*.
- Supports immune health\*.
- When under stress the body produces free radicals that can damage cells and weaken the immune system. NutraGreens® is especially formulated to give the body what it needs to protect itself against the effects of stress\*.
- Nutrient antioxidants found in NutraGreens® may act to neutralize free radicals and maintain cellular and immune health\*.

**\*THESE STATEMENTS HAVE NOT BEEN EVALUATED BY THE FDA THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE, OR PREVENT ANY DISEASE.**

Please inform me if other information or materials are needed. Thank you.

Sincerely,



Mr. Yoshimichi Ota  
President